

Federal Defenders  
OF NEW YORK, INC.

One Pierrepont Plaza-16th Floor, Brooklyn, NY 11201  
Tel: (718) 330-1200 Fax: (718) 855-0760

David E. Patton  
*Executive Director and  
Attorney-in-Chief*

Deirdre D. von Dornum  
*Attorney-in-Charge*

November 14, 2022

By ECF and Electronic Mail

The Honorable Dora L. Irizarry  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Samantha Shader, 20-CR-202 (DLI)

Dear Judge Irizarry:

We write in response to the Court's November 14 Order directing defense counsel to provide hard copies to chambers of its May 12, 2021 submission and of the August 27, 2022 report prepared by Dr. Kathy Pruzan.

First, as the Court stated in its Order, the submission referred to in paragraph 31 of the PSR ("Defense Counsel's submission, dated May 12, 2021" is the same letter that was previously provided to the government in connection with plea negotiations and referenced in the May 12, 2021 status report letter. *See* ECF No. 28. The May 12 submission was provided to Probation following the Presentence Interview because it contained corroborative biographical information. The information referenced by Probation in paragraph 31, along with the other biographical information from the May 12 submission, is included verbatim in Ms. Shader's October 24, 2022 sentencing submission to the Court. *See* ECF No. 56, Attachment 1 at 13. A hard courtesy copy of the May 12 submission will be provided to chambers this afternoon.

Second, the August 27, 2021 Pruzan report referenced in paragraph 68 of the PSR is the August 27, 2021 Pruzan report that was enclosed as Exhibit A to Mr. Shader's October 24, 2022 sentencing submission, *see* ECF No. 56, Attachments 3, 4 (Exhibit A Unredacted; Exhibit A with Proposed Redactions), and hard courtesy copies of this exhibit were previously provided to chambers. Additionally, the August 27, 2021 Pruzan report references an earlier August 7, 2022 report by the same author. *See* Exhibit A at 1 ("the below report is an update on an August 7, 2021 report by this same author."). The August 7, 2021 Pruzan report was an interim report prepared while Dr. Pruzan was awaiting MDC visitation with Ms. Shader. The interim report was provided to the government in furtherance of plea negotiations but was not provided to Probation. Hard courtesy copies of both the August 7 and August 27 Pruzan reports will be provided to chambers this afternoon.

Thank you for your consideration of this letter.

Respectfully Submitted,

/s/  
Amanda David  
Samuel Jacobson  
Leticia Olivera  
Assistant Federal Defenders

cc: all counsel of record (via ECF)  
Clerk of the Court (via ECF)